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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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SS

HENRY NARANJO and
MARIA RODRIGUEZ,

CASE NO.: 00-6022-CIV-LENARD
MAGISTRATE JUDGE TURNOFF

Plaintiff(s),

vs.

STEPHEN BYRON SMITH,

Defendant(s).

_____ /

JOINT SCHEDULING REPORT

THE PARTIES, by and through undersigned counsel, pursuant to Local Rule 16.1.B.,
hereby submit their Joint Scheduling Report and Proposed Order as follows:

1. **DISCOVERY SCHEDULE:**

- a. Exchange Interrogatories and Request for Production not later than July 1, 2000.
- b. Plaintiff will provide its list of expert witnesses not later than September 1, 2000.
- c. Defendant will provide its list of expert witnesses not later than October 15, 2000.
- d. All depositions will be completed by December 1, 2000.

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2. **SETTLEMENT:**

The parties have initially discussed settlement, however, pending initial discovery settlement is unlikely. The parties agree to again earnestly discuss settlement once initial discovery has been completed.

3. **ADDITIONAL PARTIES:**

Plaintiff is contemplating brining in the manufacturer of the yacht as an additional party.

4. **PROPOSED LIMITS ON TIME:**

- a. To join other parties and to amend the pleadings: May 15, 2000.
- b. To file and hear motions: December 15, 2000.
- c. To complete discovery December 1, 2000.

5. The parties agree that the issues are accurately set forth in the Complaint and Answer.

6. It is unlikely that amendments to the pleadings will be necessary by either party.

7. The parties agree to maximizing stipulated facts and stipulations regarding documents.

It is unlikely the parties will seek advance rulings from the Court on the admissibility of evidence.

8. The parties suggest that the Pre-Trial Stipulation required by Local Rule 16.1.E. will suffice to avoid unnecessary proof and of cumulative evidence.

9. The parties anticipate no need nor do they desire referring this matter to a Magistrate or Master.

10. The parties estimate four (4) days for the trial of this matter.

11. The parties request a Pre-Trial Conference on or about January 15, 2001, with a trial of this matter on or after February 1, 2001.

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12. **MISCELLANEOUS:**

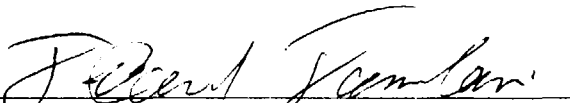
The parties respectfully bring to the Court's attention that potential witnesses exist in Wisconsin and Texas. Coordinating travel and the appearance of out-of-state witnesses can be time consuming and subject to the uncertainties of compelling the attendance of witnesses in out-of-state jurisdictions. Accordingly, the parties have set forth their discovery schedule anticipating these difficulties. This is a maritime personal injury suite, and will be a jury trial.

DATED this 4 day of April, 2000.

Respectfully submitted,

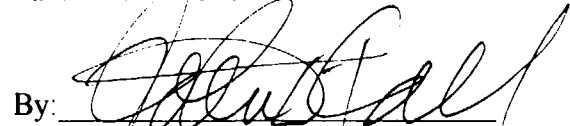
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